

Exhibit A

REDACTED

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3 Civil Case No. 13 CV 1432

4 - - - - - x
5 WILLIAM HENIG, on behalf of himself and all
6 others similarly situated,

7 Plaintiff,

8 - against -

9 QUINN EMANUEL URQUHART & SULLIVAN, LLC and
10 PROVIDUS NEW YORK, LLC,
11 Defendants.

12 - - - - - x

13 233 Broadway
14 New York, New York

15 September 5, 2014
16 10:03 a.m.

17 PRIVILEGED - CONFIDENTIAL
18 SUBJECT PROTECTIVE ORDER

19 DEPOSITION of KUSH BAMBRAH,
20 held at the above time and place, taken
21 before Brittany Saline, a Notary Public of
22 the State of New York, pursuant to the
23 Federal Rules of Civil Procedure.
24
25

1 KUSH BAMBRAH - PRIVILEGED - CONFIDENTIAL
2 out directly to you; is that correct?

3 A Yes.

4 Q And you also deal or dealt
5 directly with candidates for these
6 positions?

7 A Yes.

8 Q So you're sort of the liaison
9 between document review candidates and law
10 firms on the [REDACTED] project?

11 A The question is -- it's nuance
12 in that I wasn't the main liaison.

13 Q Who was the main liaison?

14 A It was the business person
15 who's working with the client from
16 Providus.

17 Q Who is that person?

18 A Cheryl Moore.

19 Q Okay.

20 A And/or Deb Post.

21 Q And this is specifically for
22 the [REDACTED] project of Quinn Emanuel, correct?

23 A Yes, for them it is.

24 Q Were you employed at Providus
25 when the relationship to provide document

1 KUSH BAMBRAH - PRIVILEGED - CONFIDENTIAL
2 review attorneys for this [REDACTED] project
3 began?

4 A Yes.

5 Q And do you remember how it
6 began?

7 A Yes.

8 Q Quinn Emanuel, I am assuming,
9 spoke to someone at Providus to notify them
10 that they needed attorneys for document
11 review; is that correct?

12 A Correct.

13 Q Who at Quinn Emanuel reached
14 out to Providus?

15 A I am not sure exactly.

16 Q Do you know who that person
17 reached out to, who at Providus?

18 A I would have to speculate.

19 Q Not you?

20 A Not me.

21 Q Okay. I don't want you to
22 speculate, but was there a person at
23 Providus that was generally the go-to
24 person for this type of thing?

25 A Yes.

1 KUSH BAMBRAH - PRIVILEGED - CONFIDENTIAL

2 Q And who would that be?

3 A Deb Post and or Cheryl Moore.

4 Q And do you know who at

5 Providus was responsible for negotiating

6 the terms of the relationship the [REDACTED]

7 document review project?

8 A I don't know.

9 Q But it was not you?

10 A Correct.

11 Q What was your first

12 introduction to this project? Did someone

13 notify you that we're going to be providing

14 document review?

15 A Yes.

16 Q And who was that?

17 A I believe it was Cheryl Moore.

18 Q And at that point did Cheryl

19 put you in contact with Quinn Emanuel?

20 A I was already -- it was

21 already -- well, put me in contact, yes.

22 Q And with who at Quinn Emanuel

23 did they put you in contact?

24 A Todd Riegler.

25 Q Do you remember about when

1 KUSH BAMBRAH - PRIVILEGED - CONFIDENTIAL
2 that was?

3 A This was June of 2012.

4 Q And is that project over as
5 far as Providus or DTI's concern?

6 A No.

7 Q It's still going on?

8 A Correct.

9 Q And you continue to work on
10 that project?

11 A Correct.

12 Q But since June of 2012, you
13 have had -- it's my understanding you
14 haven't had any involvement with respect to
15 what the terms of the agreement between
16 Quinn and Providus are; is that correct?

17 MR. O'KEEFE: Hang on, I want
18 to have an objection to the form of
19 the question, it's vague as stated.
20 Over the objection, you can answer it
21 if you can.

22 MR. KIRSCHENBAUM: You want to
23 repeat that question.

24 (The requested portion of the
25 record was read by the reporter.)

1 KUSH BAMBRAH - PRIVILEGED - CONFIDENTIAL
2 information.

3 Q Okay. And if it was an email
4 you would have sent out a blast to a large
5 group of Providus people?

6 A Correct, so I can't recall how
7 he came into --

8 Q Okay.

9 A -- the universe of people we
10 were considering.

11 Q Either way it appears that you
12 chose Mr. Henig's resume to pass on to
13 Quinn Emanuel for an interview for the
14 Quinn [REDACTED] project?

15 A Correct.

16 Q And then Quinn subsequently
17 invited him for an interview?

18 A Correct.

19 Q And they did that through you,
20 correct, they told you to tell him to come
21 for an interview?

22 A They told DTI.

23 Q They told DTI?

24 A Or Providus at the time.

25 Q Prior to Quinn's interviewing